



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

8701 South Gessner, Suite 1110
Houston, TX 77074

NOTICE OF AMENDMENT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

March 14, 2008

Mr. Michel E. Nelson
Sr Vice President, Natural Gas Pipeline Operations
ONEOK Partners LP
100 West Fifth Street
Tulsa, Oklahoma 74121-4298

CPF 4-2008-1004M

Dear Mr Nelson:

During the weeks of September 10-14, September 24-26, and December 6, 2007, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected your integrity management program (IMP) in Tulsa, Oklahoma and El Paso, Texas.

On the basis of the inspection, PHMSA has identified the apparent inadequacies found within ONEOK Partners, LP (ONEOK's) IMP plans or procedures for the OK TEX & Norteno Pipelines, as described below:

1. §192.911 What are the elements of an integrity management program?

(k) A management of change process as outlined in ASME/ANSI B31.8S, section 11.

- A. ONEOK must revise IMP procedures, IMP §6.2.2, to require the development of documentation which adequately addresses MOC processes and procedures for conducting an annual BAP review and updating with details as to what is being reviewed, when the review is accomplished, who is responsible for the process/procedure, and how it is being documented

- B ONEOK must revise IMP procedures concerning ASME B31.8S, section 11 b requirements to address two-way effects of changes on its pipeline system and IMP plan requirements. Examples of changes that must be included in the revised procedure are: updates to drawings and procedures after changing out piping and equipment and resetting of relief valve pressures due to the need to reduce or limit the maximum operating pressure of the pipeline

2. §192.911 What are the elements of an integrity management program?

(I) A quality assurance process as outlined in ASME/ANSI B31.8S, section 12.

ONEOK's IMP procedures must be revised to adequately address the following components of a quality assurance process as outlined by ASME B31.8S-2004, Section 12.2(b)

- a detailed responsibilities and authorities for all key elements of the integrity management program shall be adequately defined in IMP documentation
- b. specify when the Integrity Management Oversight Group (IMOG) meetings and reviews of the IMP plan will be conducted including the nature of required documentation

3. §192.915 What knowledge and training must personnel have to carry out an integrity management program?

- (a) Supervisory personnel. The integrity management program must provide that each supervisor whose responsibilities relate to the integrity management program possesses and maintains a thorough knowledge of the integrity management program and of the elements for which the supervisor is responsible. The program must provide that any person who qualifies as a supervisor for the integrity management program has appropriate training or experience in the area for which the person is responsible.
- (b) Persons who carry out assessments and evaluate assessment results. The integrity management program must provide criteria for the qualification of any person--
 - (1) Who conducts an integrity assessment allowed under this subpart; or
 - (2) Who reviews and analyzes the results from an integrity assessment and evaluation; or
 - (3) Who makes decisions on actions to be taken based on these assessments.

ONEOK'S IMP procedures for training and qualifications program must be revised to adequately address the following

- a ONEOK must develop and specify the specific requirements such that supervisory personnel have the appropriate training or experience in order to perform their assigned responsibilities.
- b. ONEOK must develop and specify requirements for training and qualification requirements for personnel who conduct an integrity assessment within the integrity management program.

- c. ONEOK must develop and specify requirements for training and qualification requirements for personnel who reviews and analyzes the results from an integrity assessment and evaluation within the integrity management program
- d. ONEOK must develop and specify requirements for training and qualification requirements for personnel who make decisions on actions to be taken based in an integrity assessment within the integrity management program
- e. ONEOK must have provisions requiring documentation that is sufficiently explicit to verify the qualifications of personnel that carry out assessments and who evaluate assessment results,

4. §192.917 How does an operator identify potential threats to pipeline integrity and use the threat identification in its integrity program?

(a) Threat identification. An operator must identify and evaluate all potential threats to each covered pipeline segment. Potential threats that an operator must consider include, but are not limited to, the threats listed in ASME/ANSI B31.8S (incorporated by reference, see § 192.7), section 2, which are grouped under the following four categories:

- (1) Time dependent threats such as internal corrosion, external corrosion, and stress corrosion cracking;**

ONEOK must revise its IMP procedures, IMP-6-003, to ensure the inclusion of provisions for addressing the threat of near neutral pH stress corrosion cracking in its threat identification and risk assessments

5. §192.917 How does an operator identify potential threats to pipeline integrity and use the threat identification in its integrity program?

(b) Data gathering and integration. To identify and evaluate the potential threats to a covered pipeline segment, an operator must gather and integrate existing data and information on the entire pipeline that could be relevant to the covered segment. In performing this data gathering and integration, an operator must follow the requirements in ASME/ANSI B31.8S, section 4. At a minimum, an operator must gather and evaluate the set of data specified in Appendix A to ASME/ANSI B31.8S, and consider both on the covered segment and similar non-covered segments, past incident history, corrosion control records, continuing surveillance records, patrolling records, maintenance history, internal inspection records and all other conditions specific to each pipeline.

- A. ONEOK must revise its IMP plan and related procedures, IMP-6-003 and IMP-6-004, to provide details of how ONEOK collects, reviews and analyzes data for its covered segments. ONEOK's IMP-4-001 and O&M Procedure 415 must be revised to provide additional details as to how the data is gathered and integrated into ONEOK's IMP data gathering, threat identification and risk assessment processes.
- B. ONEOK must revise its IMP procedures to ensure the inclusion of provisions for addressing the threat of near neutral pH stress corrosion cracking in its threat identification and risk assessments.
- C. ONEOK's must revise its IMP plan to describe how it will address data and information in its threat identification and risk analysis process. ONEOK's IMP plan lacks details of how data and information regarding past incident history, corrosion control records, continuing surveillance records, patrolling records, maintenance

history, internal inspection records, and other conditions specific to each pipeline are gathered and analyzed for updates to the threat and risk assessments

6. §192.917 How does an operator identify potential threats to pipeline integrity and use the threat identification in its integrity program?

(c) Risk assessment. An operator must conduct a risk assessment that follows ASME/ANSI B31.8S, section 5, and considers the identified threats for each covered segment. An operator must use the risk assessment to prioritize the covered segments for the baseline and continual reassessments (§§192.919, 192.921, 192.937), and to determine what additional preventive and mitigative measures are needed (§192.935) for the covered segment.

ONEOK's risk model uses numeric values that correspond to conditions that may lead to pipeline failure. To avoid subjectivity, ONEOK employs SMEs to validate the risk model. ONEOK's IMP plan must be revised to provide for documentation of

- a subject matter experts (SME) risk model meetings,
- b when risk model meetings with SMEs will be held and
- c. how SMEs are used to provide input for threat weightings and values

7. §192.917 How does an operator identify potential threats to pipeline integrity and use the threat identification in its integrity program?

(e) Actions to address particular threats. If an operator identifies any of the following threats, the operator must take the following actions to address the threat.

(1) Third party damage. An operator must utilize the data integration required in paragraph (b) of this section and ASME/ANSI B31.8S, Appendix A7 to determine the susceptibility of each covered segment to the threat of third party damage. If an operator identifies the threat of third party damage, the operator must implement comprehensive additional preventive measures in accordance with § 192.935 and monitor the effectiveness of the preventive measures. If, in conducting a baseline assessment under § 192.921, or a reassessment under § 192.937, an operator uses an internal inspection tool or external corrosion direct assessment, the operator must integrate data from these assessments with data related to any encroachment or foreign line crossing on the covered segment, to define where potential indications of third party damage may exist in the covered segment.

An operator must also have procedures in its integrity management program addressing actions it will take to respond to findings from this data integration.

ONEOK must revise its IMP plan and procedures to include details of how it will integrate ILI or ECDA results with data on encroachments and foreign line crossings in the same segment to define locations of potential third party damage

8. §192.917 How does an operator identify potential threats to pipeline integrity and use the threat identification in its integrity program?

(e) Actions to address particular threats. If an operator identifies any of the following threats, the operator must take the following actions to address the threat.

(3) Manufacturing and construction defects. If an operator identifies the threat of manufacturing and construction defects (including seam defects) in the covered segment, an operator must analyze the covered segment to determine the risk of failure from these defects. The analysis must consider the results of prior assessments on the covered segment. An operator may consider manufacturing and construction related defects to be stable defects if the operating pressure on the covered segment has not increased over the maximum operating pressure experienced during the five years preceding identification of the high consequence area. If any of the following changes occur in the covered segment, an operator must prioritize the covered segment as a high risk segment for the baseline assessment or a subsequent reassessment.

(i) Operating pressure increases above the maximum operating pressure experienced during the preceding five years;

(ii) MAOP increases; or

(iii) The stresses leading to cyclic fatigue increase.

(4) ERW pipe. If a covered pipeline segment contains low frequency electric resistance welded pipe (ERW), lap welded pipe or other pipe that satisfies the conditions specified in ASME/ANSI B31.8S, Appendices A4.3 and A4.4, and any covered or noncovered segment in the pipeline system with such pipe has experienced seam failure, or operating pressure on the covered segment has increased over the maximum operating pressure experienced during the preceding five years, an operator must select an assessment technology or technologies with a proven application capable of assessing seam integrity and seam corrosion anomalies. The operator must prioritize the covered segment as a high risk segment for the baseline assessment or a subsequent reassessment.

ONEOK must develop IMP procedures to identify potential threats to pipeline integrity and use the threat identification in its integrity program that includes details of how to.

- a. identify the maximum pressure (within the previous 5 years of establishing the baseline assessment plan for its covered segments) of those pipelines containing ERW or lap welded pipe for which no pressure test records exist, to ensure the manufacturing threat remains stable
- b. establish and to monitor the pressure of these lines to ensure the pressure has not increased and to react to any situations where the pressure may increase, (i.e. schedule the covered segment as a high priority within its BAP)
- c. require the review of the BAP and risk rank pipeline segments in the BAP based upon the inclusion of these threats to all of the pipeline segments in the BAP

9. **§192.917 How does an operator identify potential threats to pipeline integrity and use the threat identification in its integrity program?**

(e) Actions to address particular threats. If an operator identifies any of the following threats, the operator must take the following actions to address the threat.

(4) ERW pipe. If a covered pipeline segment contains low frequency electric resistance welded pipe (ERW), lap welded pipe or other pipe that satisfies the conditions specified in ASME/ANSI B31.8S, Appendices A4.3 and A4.4, and any covered or noncovered segment in the pipeline system with such pipe has experienced seam failure, or operating pressure on the covered segment has increased over the maximum operating pressure experienced during the preceding five years, an operator must select an assessment technology or technologies with a proven application capable of assessing seam integrity and seam corrosion anomalies. The operator must prioritize the covered segment as a high risk segment for the baseline assessment or a subsequent reassessment.

ONEOK must revise IMP procedure, IMP-6-005 §2 1 5 4 to require the timing of review and documentation of pipelines in their IMP that have experienced any seam failures, and to include in IMP procedures the requirement to assessment of the entire pipeline when it contains LF-ERW or lap welded pipe

10. **§192.917 How does an operator identify potential threats to pipeline integrity and use the threat identification in its integrity program?**

(e) Actions to address particular threats. If an operator identifies any of the following threats, the operator must take the following actions to address the threat.

(5) Corrosion. If an operator identifies corrosion on a covered pipeline segment that could adversely affect the integrity of the line (conditions specified in §192.933), the operator must evaluate and remediate, as necessary, all pipeline segments (both covered and non-covered) with similar material coating and environmental characteristics. An operator must establish a schedule for evaluating and remediating, as necessary, the similar segments that is consistent with the operator's established operating and maintenance procedures under part 192 for testing and repair.

ONEOK must revise IMP procedures to provide references to appropriate O&M procedures within its IMP plan and procedures to identify when it will follow specific O&M procedures to evaluate and remediate, as necessary, all pipeline segments (both covered and non-covered) with similar material coating and environmental characteristic and how additional preventive and mitigative measures will be applied

11. §192.933 What actions must be taken to address integrity issues?

(b) Discovery of condition. Discovery of a condition occurs when an operator has adequate information about a condition to determine that the condition presents a potential threat to the integrity of the pipeline. A condition that presents a potential threat includes, but is not limited to, those conditions that require remediation or monitoring listed under paragraphs (d)(1) through (d)(3) of this section. An operator must promptly, but no later than 180 days after conducting an integrity assessment, obtain sufficient information about a condition to make that determination, unless the operator demonstrates that the 180-day period is impracticable.

ONEOK must revise its IMP procedures, IMP-6-017 §2 2 1, to provide details of when discovery occurs during assessments with hydrostatic pressure tests or with pressure tests using natural gas or other gas, or upon receipt of information from an ILI tool vendor. IMP procedures must describe responsibilities, guidance or criteria for what constitutes having adequate information to declare discovery of anomalous conditions or what is meant by the integrity assessment date (completion date).

12. §192.933 What actions must be taken to address integrity issues?

(c) Schedule for evaluation and remediation. An operator must complete remediation of a condition according to a schedule that prioritizes the conditions for evaluation and remediation. Unless a special requirement for remediating certain conditions applies, as provided in paragraph (d) of this section, an operator must follow the schedule in ASME/ANSI B31.8S (incorporated by reference, see § 192.7), section 7, Figure 4. If an operator cannot meet the schedule for any condition, the operator must justify the reasons why it cannot meet the schedule and that the changed schedule will not jeopardize public safety. An operator must notify OPS in accordance with § 192.949 if it cannot meet the schedule and cannot provide safety through a temporary reduction in operating pressure or other action. An operator must also notify a State or local pipeline safety authority when either a covered segment is located in a State where OPS has an interstate agent agreement, or an intrastate covered segment is regulated by that State.

(d) Special requirements for scheduling remediation.—

(1) Immediate repair conditions. An operator's evaluation and remediation schedule must follow ASME/ANSI B31.8S, section 7 in providing for immediate repair conditions. To maintain safety, an operator must temporarily reduce operating pressure in accordance with paragraph (a) of this section or shut down the pipeline until the operator completes the repair of these conditions. An operator must treat the following conditions as immediate repair conditions:

(i) A calculation of the remaining strength of the pipe shows a predicted failure pressure less than or equal to 1.1 times the maximum allowable operating pressure at the location of the anomaly. Suitable remaining strength calculation methods include, ASME/ANSI B31G; RSTRENG; or an alternative equivalent method of remaining strength calculation. These documents are incorporated by reference and available at the addresses listed in appendix A to part 192.

(ii) A dent that has any indication of metal loss, cracking or a stress riser.

(iii) An indication or anomaly that in the judgment of the person designated by the operator to evaluate the assessment results requires immediate action.

ONEOK must revise IMP procedures, IMP-6-017, to provide for

- a. reducing pressure and investigating immediate conditions within 5 days of discovery'
- b. specific details of how ONEOK determines the remediation schedules of anomalies, including taking into account anomaly growth rates,
- c. if a pressure reduction is taken and an "immediate" anomaly remediation can not be made within five days, ONEOK must document a justification for any delays

13. §192.933 What actions must be taken to address integrity issues?

(c) see above

(d) Special requirements for scheduling remediation

(3) Monitored conditions. An operator does not have to schedule the following conditions for remediation, but must record and monitor the conditions during subsequent risk assessments and integrity assessments for any change that may require remediation:

(i) A dent with a depth greater than 6% of the pipeline diameter (greater than 0.50 inches in depth for a pipeline diameter less than NPS 12) located between the 4 o'clock position and the 8 o'clock position (bottom 1/3 of the pipe).

(ii) A dent located between the 8 o'clock and 4 o'clock positions (upper 2/3 of the pipe) with a depth greater than 6% of the pipeline diameter (greater than 0.50 inches in depth for a pipeline diameter less than Nominal Pipe Size (NPS) 12), and engineering analyses of the dent demonstrate critical strain levels are not exceeded.

(iii) A dent with a depth greater than 2% of the pipeline's diameter (0.250 inches in depth for a pipeline diameter less than NPS 12) that affects pipe curvature at a girth weld or a longitudinal seam weld, and engineering analyses of the dent and girth or seam weld demonstrate critical strain levels are not exceeded. These analyses must consider weld properties.

ONEOK must revise IMP procedures to include details of how it will evaluate conditions associated with "monitored conditions" and react to any changes affecting the categorization of those conditions such as changed corrosion growth rates, etc

14. §192.933 What actions must be taken to address integrity issues?

(d) Special requirements for scheduling remediation.—

(1) Immediate repair conditions. An operator's evaluation and remediation schedule must follow ASME/ANSI B31.8S, section 7 in providing for immediate repair conditions. To maintain safety, an operator must temporarily reduce operating pressure in accordance with paragraph (a) of this section or shut down the pipeline until the operator completes the repair of these conditions. An operator must treat the following conditions as immediate repair conditions:

- (i) A calculation of the remaining strength of the pipe shows a predicted failure pressure less than or equal to 1.1 times the maximum allowable operating pressure at the location of the anomaly. Suitable remaining strength calculation methods include, ASME/ANSI B31G; RSTRENG; or an alternative equivalent method of remaining strength calculation. These documents are incorporated by reference and available at the addresses listed in appendix A to part 192.
 - (ii) A dent that has any indication of metal loss, cracking or a stress riser.
 - (iii) An indication or anomaly that in the judgment of the person designated by the operator to evaluate the assessment results requires immediate action.
- (2) One-year conditions. Except for conditions listed in paragraph (d)(1) and (d)(3) of this section, an operator must remediate any of the following within one year of discovery of the condition:
- (i) A smooth dent located between the 8 o'clock and 4 o'clock positions (upper 2/3 of the pipe) with a depth greater than 6% of the pipeline diameter (greater than 0.50 inches in depth for a pipeline diameter less than Nominal Pipe Size (NPS) 12).
 - (ii) A dent with a depth greater than 2% of the pipeline's diameter (0.250 inches in depth for a pipeline diameter less than NPS 12) that affects pipe curvature at a girth weld or at a longitudinal seam weld.
- (3) Monitored conditions. An operator does not have to schedule the following conditions for remediation, but must record and monitor the conditions during subsequent risk assessments and integrity assessments for any change that may require remediation:
- (i) A dent with a depth greater than 6% of the pipeline diameter (greater than 0.50 inches in depth for a pipeline diameter less than NPS 12) located between the 4 o'clock position and the 8 o'clock position (bottom 1/3 of the pipe).
 - (ii) A dent located between the 8 o'clock and 4 o'clock positions (upper 2/3 of the pipe) with a depth greater than 6% of the pipeline diameter (greater than 0.50 inches in depth for a pipeline diameter less than Nominal Pipe Size (NPS) 12), and engineering analyses of the dent demonstrate critical strain levels are not exceeded.
 - (iii) A dent with a depth greater than 2% of the pipeline's diameter (0.250 inches in depth for a pipeline diameter less than NPS 12) that affects pipe curvature at a girth weld or a longitudinal seam weld, and engineering analyses of the dent and girth or seam weld demonstrate critical strain levels are not exceeded. These analyses must consider weld properties.

ONEOK must revise IMP procedures to reference specific O & M procedures to be used in evaluating anomaly corrosion, applying R-STRENG or ASME B31G, investigating material failures, anomaly repair methods, how it applies the anomaly evaluation process and how the results are documented.

15. §192.935 What additional preventive and mitigative measures must an operator take to protect the high consequence area?

(a) General requirements. An operator must take additional measures beyond those already required by Part 192 to prevent a pipeline failure and to mitigate the consequences of a pipeline failure in a high consequence area. An operator must base the additional measures on the threats the operator has identified to each pipeline segment. (See §192.917) An operator must conduct, in accordance with one of the risk assessment approaches in ASME/ANSI B31.8S (incorporated by reference, see §192.7), section 5, a risk analysis of its pipeline to identify additional measures to protect the high consequence area and enhance public safety. Such additional measures include, but are not limited to, installing Automatic Shut-off Valves or Remote Control Valves, installing computerized monitoring and leak detection systems, replacing pipe segments with pipe of heavier wall thickness, providing additional training to personnel on response procedures, conducting drills with local emergency responders and implementing additional inspection and maintenance programs.

ONEOK must revise its IMP procedures to include more comprehensive decision making processes in evaluating threats and determining additional preventive and mitigative measures as follows

- a a systematic, documented P&M measures decision-making process to decide which measures are to be implemented, involving input from relevant parts of the organization such as operations, maintenance, engineering, and corrosion control.
- b a P&M measures decision-making process that considers the consequences of pipeline failures.
- c identified and documented additional measures that have actually been implemented, or scheduled for implementation on a HCA specific basis
- d a comprehensive process for evaluating and documenting the need for Automatic Shut-off Valves or Remote Control Valves

16. §192.935 What additional preventive and mitigative measures must an operator take to protect the high consequence area?

(b) Third party damage and outside force damage—

(2) Outside force damage. If an operator determines that outside force (e.g., earth movement, floods, unstable suspension bridge) is a threat to the integrity of a covered segment, the operator must take measures to minimize the consequences to the covered segment from outside force damage. These measures include, but are not limited to, increasing the frequency of aerial, foot or other methods of patrols, adding external protection, reducing external stress, and relocating the line.

ONEOK must revise its IMP procedures to clarify and address the risk analysis results sufficiently to determine which factors affect risk the most (i.e., the "risk drivers") and select preventive and mitigative measures that affect the dominant risk factors to implement additional preventative and Mitigative measures.

17. **§192.935 What additional preventive and mitigative measures must an operator take to protect the high consequence area?**

(d) Pipelines operating below 30% SMYS. An operator of a transmission pipeline operating below 30% SMYS located in a high consequence area must follow the requirements in paragraphs (d)(1) and (d)(2) of this section. An operator of a transmission pipeline operating below 30% SMYS located in a Class 3 or Class 4 area but not in a high consequence area must follow the requirements in paragraphs (d)(1), (d)(2) and (d)(3) of this section.

(1) Apply the requirements in paragraphs (b)(1)(i) and (b)(1)(iii) of this section to the pipeline; and

(2) Either monitor excavations near the pipeline, or conduct patrols as required by §192.705 of the pipeline at bi-monthly intervals. If an operator finds any indication of unreported construction activity, the operator must conduct a follow up investigation to determine if mechanical damage has occurred.

(3) Perform semi-annual leak surveys (quarterly for unprotected pipelines or cathodically protected pipe where electrical surveys are impractical).

ONEOK must revise its IMP procedures to provide cross references to appropriate O&M procedures and to identify when it will follow specific O&M procedures in applying additional preventive and mitigative measures such as in one-call excavations, third party damage, performing leak surveys and continuing surveillance.

18. **§192.947 What records must an operator keep?**

An operator must maintain, for the useful life of the pipeline, records that demonstrate compliance with the requirements of this subpart. At minimum, an operator must maintain the following records for review during an inspection.

(b) Documents supporting the threat identification and risk assessment in accordance with §192.917;

(d) Documents to support any decision, analysis and process developed and used to implement and evaluate each element of the baseline assessment plan and integrity management program. Documents include those developed and used in support of any identification, calculation, amendment, modification, justification, deviation and determination made, and any action taken to implement and evaluate any of the program elements;

(e) Documents that demonstrate personnel have the required training, including a description of the training program, in accordance with §192.915;

(f) Schedule required by §192.933 that prioritizes the conditions found during an assessment for evaluation and remediation, including technical justifications for the schedule.

ONEOK must revise its IMP plan and procedures, IMP §4.2, to ensure it consistently provides documentation and a review schedule to support all decisions, analyses, and processes used to implement and evaluate each element of the baseline assessment plan and integrity management program and a schedule for when these activities should be performed.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.237. Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Compliance Proceedings*. Please refer to this document and note the response options. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b). If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue a Final Order.

If, after opportunity for a hearing, your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. § 190.237). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within 30 days of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

In correspondence concerning this matter, please refer to **CPF 4-2008-1004M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,



R. M. Seeley
Director, Southwest Region
Pipeline and Hazardous Materials Safety Administration

Enclosure. *Response Options for Pipeline Operators in Compliance Proceedings*